



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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MKM:MKP/TH/MJL  
F. #2017R01840

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 15, 2019

By ECF

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.  
Criminal Docket No. 18-204 (NGG)

Dear Judge Garaufis:

The government respectfully submits this letter to update the Court regarding its expert disclosures. The government is in the process of retaining Dr. Stuart Grassian to offer testimony on the subject of social isolation, and Dr. Dawn Hughes to offer testimony on the subject of the behavior of victims of sex crimes, as further described in the government's disclosure, dated February 25, 2019. The doctors' CVs are separately being emailed to defense counsel and each doctor has been qualified as an expert by various courts on the same general topics as to which the government will seek to have them testify. The government is also still in the process of evaluating who it will offer to testify regarding the health effects of extreme calorie restriction and sleep deprivation.

Because the procurement process is incomplete, the government respectfully requests that a deadline for any supplementary disclosures as to these witnesses be discussed at the status conference on Monday, March 18. Moreover, based on the current trial date, the government does not intend to call Dr. Welner as a witness; however, the government

reserves its right to move the Court at a later date to offer testimony from Dr. Welner if the trial date moves.

Respectfully submitted,

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cc: Clerk of Court (NGG) (by ECF)  
Counsel of Record (by ECF)